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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**JOHN DOE,**

and

**JANE DOE**

Plaintiffs,

v.

**PAMELA BONDI, in her official capacity as  
Attorney General of the United States,  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001**

**KRISTI NOEM, in her  
official capacity as Secretary, U.S.  
Department of Homeland Security,  
2707 Martin Luther King Jr. Ave, SE  
Washington, DC 20528-0485**

**KIKA SCOTT, in her official capacity as  
Senior Official Performing the Duties of  
Director, U.S. Citizenship and Immigration  
Services,  
2707 Martin Luther King Jr. Ave, SE  
Washington, DC 20528-0485**

**JOSEPH CARDINALE, in his  
official capacity as Director, U.S.  
Citizenship and Immigration Services, New  
York Field Office,  
2707 Martin Luther King Jr. Ave, SE  
Washington, DC 20528-0485**

**Case No.:**

**PLAINTIFF'S MOTION TO FILE  
COMPLAINT UNDER PSEUDONYMS**

**SIRCE E. OWEN, in her official capacity as  
the Acting Director of the EOIR**

950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

Defendants.

**MOTION TO FILE UNDER PSEUDONYMS THEIR COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE RELIEF**

Pursuant to Local Electronic Case Filing Rule 6, Plaintiffs (“John and Jane Doe”), hereby move to file their forthcoming complaint for declaratory and injunctive relief using the pseudonyms JOHN AND JANE DOE,

1. Local Electronic Case Filing Rule 6 requires parties to obtain leave of Court an order to file documents under pseudonyms
2. John and Jane Doe intend to file a complaint for declaratory and injunctive relief pursuant to the Administrative Procedure Act (APA) challenging the decisions made by United States Citizenship and Immigration Services (USCIS) and the Board of Immigration Appeals (BIA) in denying John Doe’s I-130 petition for Jane Doe.
3. Good cause exists to proceed under pseudonyms because John and Jane Doe’s substantial privacy interests outweigh any public interest served by using their real names.
4. Plaintiff, Jane Doe, has a pending asylum application in immigration court in which she claims fear of returning to Iran dues to her political beliefs. She reasonably fears reprisal if her identity and the identity of her husband, John Doe are disclosed.
5. The case involves issues that could expose Plaintiffs to significant reputational, professional, or personal harm.

6. Defendants will not be prejudiced by Plaintiffs' use of pseudonyms, as they will be able to fully defend against all claims raised.
7. The public's interest in open judicial proceedings is outweighed by Plaintiffs' right to privacy and safety. Further, Plaintiffs' legal claims may proceed on their merits regardless of their identities.

For the foregoing reasons, John Jane Doe respectfully urge this Court to GRANT this motion to proceed with pseudonyms.

Respectfully submitted on this 19<sup>th</sup> day of March 2025

**/S/ Abdolreza Mazaheri**

By: 

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